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REMARKS

Claim 3 stands rejected under 35 U.S.C. §112, first paragraph. However, given that claim 3 was filed with this application as part of the original disclosure, and that one of ordinary skill in the art would recognize and comprehend the meets and bounds thereof, it is respectfully submitted that claim 3 is self-supporting, and deserving of examination.

Claims 1-3, 8-12 and 14 stand rejected under 35 U.S.C. §102(e) over Nguyen, U.S. Patent No. 6,072,494. With the exception of claim 1, these claims are being resubmitted in unamended form, since anticipation has not been established.

Nguyen does not teach "a method of behavior recognition, comprising the steps of: analyzing a gesture-making target utilizing a plurality of gesture-recognition modules, each outputting information relating to target location and gesture type...and comparing gestures to pre-defined behaviors." Nguyen also seems to be using 'gesture' and 'behavior' interchangeably, as one identified motion, which is not what Applicants are doing. Instead, Nguyen specifically states (in the Abstract, among other places), that recognition is based on the *semantic meaning of the gesture*; that is, whether a person's arms were up, then down, then up, and so forth, this sequence defining "a behavior." Put it another way: the system recognizes static pose A, then B, then A, in that sequence.

Applicants' approach is markedly different. Instead of following a sequence of static gestures, Applicants' invention as claimed includes examining the dynamic content of individual gestures, and combines this with location as part of an overall strategy.

In particular, Applicants look at the dynamic gesture content of a target (i.e., a person's body, hands, and feet, etc.); classifies them predefined behaviors, then looks at the combined motions to determine if someone is running, sneaking, jumping, or other engaged in some other dynamic activity. Thus, for Applicants, a gesture is one motion in 3-D space. A behavior is a combination of individually identified gestures, which are combined and then compared to identified behaviors. Applicants do not look at semantic properties at all.

Also, the "comparing the information from the gesture-recognition modules to the predefined behaviors" uses similar words to what Applicants claim, but Nguyen's words have different meanings. Whereas Nguyen is recognizing a static pose, Applicants' is recognizing *motion dynamics*. Nguyen's predefined behaviors are a combination of static poses; in contrast, Applicants' definition of behavior is,

again, a combination of multiple gestures over time.

Based upon the foregoing comments, Applicants believe all claims are in condition for allowance.

Respectfully submitted,

By: _____

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